

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

Craig Cunningham,

Plaintiff,

v.

Watts Guerra, LLP, Mikal C. Watts, Watts Guerra, LLP; Francisco Guerra IV, Watts Guerra, LLP; Paige Boldt, Watts Guerra LLP; Berken Media, LLC, Robert Kenyon, Natural Person and Corporate Officer of Berken Media, LLC; and Jonh/Jane Does 1-5,

Defendants.

CONSOLIDATED CASE NO. SA-22-CV-00363-OLG

Craig Cunningham, on behalf of himself and all others similarly situated,

Plaintiff,

v.

Watts Guerra, LLP, Watts Guerra, LLC, Henson Fuerst, P.A., Law Office of Douglas Boxer, and Biltmore Law Group, PLLC,

Defendants.

CASE NO. SA-23-CV-00910-OLG

**PLAINTIFF’S NOTICE OF UNAVAILABILITY**

Craig Cunningham (“Plaintiff”) hereby gives notice to the Court and all other parties that the following undersigned counsel, Alex Kruzyk and Bryan Giribaldo, will each be traveling internationally from March 25, 2024 through April 9, 2024. Mr. Kruzyk and Mr. Giribaldo will have access to emails, but any responses are likely to be delayed due to extensive time zone differences during this period of time. As such, and given that Plaintiff’s remaining undersigned

counsel reside in California, Plaintiff respectfully requests that any in-person hearings be set to occur outside of this period of time. Furthermore, Logan A. Pardell, also a partner at Pardell, Kruzyk, & Giribaldo, PLLC, will be monitoring emails and communications to the undersigned's general email addresses and phone number during this period.

Date: March 13, 2024.

/s/ Alex D. Kruzyk  
Alex D. Kruzyk  
Bryan A. Giribaldo  
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*Counsel for Plaintiff*

### **CERTIFICATE OF SERVICE**

I hereby certify that on March 13, 2024, I filed the foregoing with the Clerk of Court using the Court's CM/ECF system, which will provide electronic notice to all counsel of record.

/s/ Alex D. Kruzyk  
Alex D. Kruzyk